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8 Attorneys for Plaintiff

9  
10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13  
14 UNITED STATES OF AMERICA, ) CR No. 07-0454 PJH  
15 Plaintiff, )  
16 v. ) STIPULATION AND [PROPOSED] ORDER  
17 SHANNON BLAYLOCK, ) EXCLUDING TIME UNDER 18 U.S.C. § 3161  
18 aka ARLANDYS RICHARDSON, )  
19 aka "DADDY RICH", )  
20 TAWAKONI SEATON, )  
aka TONI, and )  
21 LATOSHA GARDNER, )  
22 Defendant. )

23 On March 26, 2008, the parties in this case appeared before the Court and stipulated that  
24 time should be excluded from the Speedy Trial Act calculations for co-defendant Gardner from  
25 March 26, 2008 through April 9, 2008 and for co-defendants Blaylock and Seaton from March  
26 26, 2008 through April 30, 2008. The parties represented that granting the continuance was

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STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME, 07-0454 PJH

1 necessary for effective preparation of counsel, taking into account the exercise of due diligence.

2 See 18 U.S.C. § 3161(h)(8)(B)(iv).

3 SO STIPULATED:

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5 JOSEPH P. RUSSONIELLO  
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8 United States Attorney

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10 DATED: April 30, 2008

11 /s/ Denise Barton  
12 DENISE MARIE BARTON  
13 Assistant United States Attorney

14 DATED: April 30, 2008

15 /s/  
16 MICHAEL STEPANIAN  
17 Attorney for SHANNON BLAYLOCK

18 DATED: April 30, 2008

19 /s/  
20 KENNETH WINE  
21 Attorney for TAWAKONI SEATON

22 DATED: April 30, 2008

23 /s/  
24 JODI LINKER  
25 Attorney for LATOSHA GARDNER

## 1 [Proposed] Order

2 As the Court found on March 26, 2008 and for the reasons stated above, the Court finds that  
3 the ends of justice served by the continuance outweigh the best interests of the public and the  
4 defendants in a speedy trial and that time should be excluded from the Speedy Trial Act  
5 calculations time should be excluded from March 26, 2008 through April 9, 2008 for co-  
6 defendant Gardner and from March 26, 2008 through April 30, 2008 for co-defendants Blaylock  
7 and Seaton for effective preparation of counsel. See 18 U.S.C. §3161 (h)(8)(A). The failure to  
8 grant the requested continuance would deny counsel reasonable time necessary for effective  
9 preparation of counsel, taking into account the exercise of due diligence, and would result in a  
10 miscarriage of justice. See 18 U.S.C. §3161(h)(8)(B)(iv).

11  
12 SO ORDERED.

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14 DATED: 5/1/08

